

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CRIMINAL NO. 10-69 (MJD/JJK)

ENTER UNDER SEAL

UNITED STATES OF AMERICA,)	SECOND
)	SUPERSEDING INDICTMENT
Plaintiff,)	
)	(18 U.S.C. § 982(a)(1))
v.)	(18 U.S.C. § 982(b)(1))
)	(21 U.S.C. § 841(a)(1))
15. ALEJANDRO SERRANO LOPEZ,)	(21 U.S.C. § 841(b)(1)(A))
)	(21 U.S.C. § 841(b)(1)(C))
18. SALVADOR RUIZ,)	(21 U.S.C. § 846)
a/k/a Chavo,)	(21 U.S.C. § 853)
)	
19. AGUSTIN NUNEZ-REYNOSO,)	
a/k/a Shorty, and)	
)	
20. AGUSTIN PROA-ROMERO,)	
)	
Defendants.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute)

From in or about January of 2008 and continuing through in or about March, 2010, in the State and District of Minnesota, the defendants,

ALEJANDRO SERRANO LOPEZ,
SALVADOR RUIZ,
a/k/a Chavo,
AGUSTIN NUNEZ-REYNOSO,
a/k/a Shorty, and
AGUSTIN PROA-ROMERO,

knowingly and intentionally conspired with each other and with other persons, whose names are known and unknown to the grand jury, to distribute and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a controlled substance, and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, and

SCANNED

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U.S. DISTRICT COURT ST. PAUL

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U.S. v. Walter Ochoa, et al.

Criminal No. 10-69 (MJD/JJK)

100 kilograms or more of a mixture or substance containing marijuana, a controlled substance, and 1,000 tablets (250 grams) of a mixture or substance containing a detectable amount of 3,4-methylenedioxymethamphetamine, also known as MDMA or "Ecstasy," a controlled substance in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C) and 846.

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853(a).

If convicted of Count 1 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (a)(2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violation, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violation.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON